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January 19, 1996

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BY HAND

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

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Re: Administration of the North American Numbering  
Plan, CC Docket 92-237; Nomination of Larry Berent  
for membership on the North American Numbering  
Council

Dear Mr. Caton:

On behalf of DCR Communications Inc. ("DCR"), this letter serves to nominate Larry Berent of DCR to serve on the North American Numbering Council ("NANC").

As a prospective C block PCS licensee, DCR has a strong interest in every aspect of numbering policy, especially as it affects the rapidly expanding wireless community. As a small start-up business in the PCS industry, made up of numerous individuals with extensive experience with cellular, specialized mobile radio, and wireless long distance service, DCR would bring valuable experience and insight to the formation of numbering policy. DCR responds below to the application requirements set forth in Section (B)(5) of the August 9, 1995 Public Notice regarding nominations to the NANC.

(a) Larry Berent is Vice President, Corporate Services and Regulatory Affairs of DCR, a start-up company formed to bid for C PCS block licenses and offer PCS in a number of markets nationwide. Mr. Berent, who is an attorney, has held legal or management positions within the telecommunications industry for over 12 years. On the NANC, Mr. Berent would represent the interests of start-up companies that, by virtue of the delayed commencement of the C block auctions, will enter the PCS industry sometime in mid or late 1996.

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Mr. William F. Caton  
January 19, 1996  
Page 2

(b) Mr. Berent's address is as follows

Larry Berent  
DCR Communications, Inc.  
2550 M Street, N.W.  
Suite 200  
Washington, D.C. 20037  
lberent@744,3390  
202-496-4300  
202-331-0809 (fax)

(c) As a key managing officer of DCR, Mr. Berent is responsible, inter alia, for legal and federal regulatory issues involved in the construction and preparation of DCR's systems for operation. The executive management of DCR has accordingly tasked Mr. Berent with responsibilities that are affected by a plethora of numbering issues, including number availability, equal access to numbering resources and procedures for obtaining numbers.

(d) DCR is an interested party because its ability to create a viable national network to provide PCS depends on the availability of numbering resources on a fair, efficient and timely basis. This is particularly so for start-up companies, such as DCR and other C block bidders, who will be forced to obtain their licenses and commence operations late in the game.

(e) Mr. Berent and DCR will actively participate in good faith to pursue the objectives of the NANC.

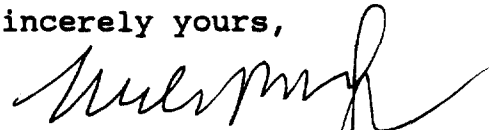
DCR respectfully requests that the Commission accept the filing of this nomination after the deadline, because, DCR submits, filing any earlier would have been premature. DCR was formed solely for the purpose of offering PCS through licenses obtained in the C block auction. Like many of the C block licensees, DCR cannot begin offering PCS until the auction is complete and it is a high bidder licensed by the Commission. DCR has no other telecommunications business for which numbering policy is relevant. In mid-September, when nominations were due, litigation made it uncertain when the C block auctions would take place and whether DCR and many other would-be C block participants would survive financially in the interim. During that period, DCR was actively involved in efforts before the Commission and in litigation to move the C block auction forward. When the C block auctions finally commenced in mid-December, enabling DCR to bid for licenses that will become the basis for its business, the partial government shutdown prevented consideration of this nomination. As the bidding indicates, DCR

Mr. William F. Caton  
January 19, 1996  
Page 3

has actively participated in the ongoing C block auction. This application has, therefore, now become timely.

Finally, in light of the federal shutdown, and because the Commission has not yet acted on the nominations, Mr. Berent's nomination will cause no disruption to the work of the NANC or hardship to other parties. For the reasons stated above, DCR believes that Mr. Berent can make a valuable contribution on behalf of an important new industry segment to the work of the NANC.

Sincerely yours,

A handwritten signature in dark ink, appearing to read 'Will Richardson', with a long, sweeping vertical line extending downwards from the end of the signature.

William R. Richardson, Jr.

cc (via fax): Marian Gordon, Esq.  
Elizabeth Nightingale, Esq.